

JD

JUNE 8, 2012

UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA

FEDERAL FORMAL COMPLAINT & CASE FILING

MARY J. SCOTT
PLAINTIFF

12 3252

V.

FAYE RIVA COHEN, ESQUIRE
DAVID OH, ESQUIRE
JEFFREY D. SNYDER, ESQUIRE
BRUCE M. LUDWIG, ESQUIRE
LARRY PITT, ESQUIRE
DEPUTY ATTORNEY GENERAL HOWARD G. HOPKIRK
SENIOR DEPUTY ATTORNEY GENERAL SUE ANN UNGER
MARY KAY HENRY, SERVICES EMPLOYEES INTERNATIONAL UNION
DEFENDANTS

I, MARY J. SCOTT, PRO SE, AM PETITIONING THE FEDERAL COURT AS THE RESULT OF A FRAUDULENTLY WRIT OF EXECUTION NOTICE FILED BY ATTORNEY FAYE RIVA COHEN ON MAY 31, 2012, WITH THE PHILA. SHERIFF'S OFFICE. ATTORNEY FAYE RIVA COHEN, FILED A FRAUDULENT CLAIM IN PHILA. MUNICIPAL COURT ON 12/14/07, FOR \$11,689.57, WHERE SHE LISTED THAT SHE LITIGATED MY FEDERAL COURT CASE FILED ON JUNE 17, 2002. ATTORNEY FAYE RIVA COHEN, FILED FEDERAL SUMMONS, UNDER CV DOCKET 02-03799-JUDGE JAN E. DUBOIS, CALLS TO SENIOR DEPUTY ATTORNEY SUE ANN UNGER, ATTORNEY JEFFREY D. SNYDER, WHO WAS WITH THE LAW FIRM OF DAVID OH, ATTORNEY LARRY

J. J. J. J. J.

FEDERAL FORMAL COMPLAINT

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PITT, ATTORNEY BRUCE LUDWIG, ATTORNEY GERALD J. POMERANTZ, PSSU-S.E.I.U. ONGOING CONTRACT VIOLATIONS, CLASS ACTION SUIT, WHISTLEBLOWER FILING, REGARDING THE STATE OF PA. FAILING TO IMPLEMENT THE SUPPLEMENTAL INSURANCE BENEFIT IN CONJUNCTION WITH THE STATE OF PA. WORKERS COMPENSATIONS & SOCIAL SECURITY DISABILITY LAWS THAT WERE ENACTED IN 1973, AND LISTED IN EVERY CONTRACT AGREEMENT WITH PSSU/PESEA/SEIU, SINCE 1978. ATTORNEY FAYE RIVA COHEN, CONTACTED THE WORKER'S COMPENSATION APPEAL BOARD, DONNA D. MCQUIGGAN ON NOVEMBER 19, 2002 via fax, VERIFIED THAT THERE REVIEW BOARD IS LIMITED TO A DETERMINATION OF WHETHER THERE WAS AN ERROR OR ABUSE OF THE LAWS, AND WAS UNABLE TO ACCEPT EVIDENCE, AND DO NOT ISSUE SUBPOENAS.

ATTORNEY FAYE RIVA COHEN, FRAUDULENTLY SUBMITTED A MOTION TO DISMISS, ON 12/11/02, AND FILED MY ORIGINAL FEDERAL COURT CASE 02-cv-03799, WITH JUDGE JAN E. DUBOIS, AND FILE MY CASE WITH THE WORKERS COMPENSATION APPEAL BOARD, WITH ADMINISTRATIVE JUDGES AND NOT LAW JUDGES, ON 1/17/03, WITH THE KNOWLEDGE THAT NO LEGAL ACTION COULD BE ADJUDICATED.

ATTORNEY FAYE RIVA COHEN, FRAUDULENT FILING WITH AN APPEAL BOARD, DISMISSAL OF FEDERAL COURT CASE, WITH THE DEFENDANTS UNDERMINED ALL COURT CASES FILED BY THE PLAINTIFF, MARY J. SCOTT, PRO SE, IN SEEKING A LEGAL CORRECTION, AND TO STOP ALL EMPLOYMENT & FRAUDULENT ILLEGAL ACTIONS & HARASSMENT LEVIED AGAINST ME IN PHILA. MUNICIPAL COURT BY ATTORNEY FAYE RIVA COHEN.

I, MARY J. SCOTT, AM SEEKING THAT THE FRAUDULENT WRIT OF EXECUTION ORDER IS TERMINATED.

I, MARY J. SCOTT, AM SEEKING A MONETARY JUDGMENT AGAINST ATTORNEY FAYE RIVA COHEN IN THE AMOUNT OF FOUR MILLION DOLLARS, AND ONE MILLION DOLLARS EACH AGAINST THE DEFENDANTS FOR ILLEGAL MALPRACTICE, WITH ILLEGAL CONTRACTS LITIGATED BY THE DEFENDANTS.

THE HIGHEST LEVEL OF FRAUD WAS COMMITTED BY THE DEFENDANTS, WITH THE HIGHEST LEVEL OF LEGAL ACTIONS ARE WARRANTED. ALL COURT COST & LEGAL FEES ARE TO BE PAID BY THE DEFENDANTS, IF THEY FAIL TO PLEAD NO CONTEST.

FEDERAL FORMAL COMPLAINT

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I, MARY J. SCOTT, AM SEEKING DISBARMENT OF ATTORNEY FAYE RIVA COHEN, IN THE STATE OF PENNSYLVANIA, BASED ON DOCUMENTED FRAUD.

I DECLARE UNDER PENALTY OF PERJURY THAT THE INFORMATION FILLED IN IS TRUE AND CORRECT.

SUBMITTED UNDER THE WHISTLEBLOWERS ACT.

6/8/12



MARY J. SCOTT, PRO SE
1152 E. PHIL ELLENA ST.
PHILA. PA. 19150

(215)924-5204

CC: US JUSTICE DEPT.



**PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA**

34 South 11th Street, Philadelphia, PA. 19107

Marsha H. Neifield, President Judge

Patricia R. McDermott, Deputy Court Administrator

SC-07-12-14-5464

COPY

Faye Riva Cohen, Esquire
2047 Locust Street
Philadelphia, PA 19103

Mary J. Scott
1152 E. Phil Ellena Street
Philadelphia, PA 19150

Plaintiff(s)

Defendant(s)

The PNC Financial Services Group, AKA/DBA:
PNC Bank

ATTEST

Garnishee(s)

MAY 04 2012

NORA TAYLOR

FAYE R COHEN

Petitioner/Attorney
Attorney # 018839

Address & Phone 2047 LOCUST STREET
PHILADELPHIA, PA 19103
215-563-7776

WRIT OF EXECUTION NOTICE

This paper is a Writ of Execution. It has been issued because there is a judgment against you. It may cause your property to be held or taken to pay the judgment. You may have legal rights to prevent your property from being taken. A lawyer can advise you more specifically of these rights. If you wish you exercise your rights, you must act promptly.

The law provides that certain property cannot be taken. Such property is said to be exempt. There is a debtor's exemption of \$300. There are the following other exemptions which may be applicable to you: (1) bibles, school books, sewing machines, uniforms and equipment; (2) most wages and unemployment compensation; (3) social security benefits; (4) certain retirement funds and accounts; (5) certain veteran and armed forces benefits; and (5) certain insurance proceeds. You may have other exemptions or other rights.

If you have an exemption, you should do the following promptly: (1) fill out the attached claim for exemption form and demand for a prompt hearing and (2) deliver the form or mail it to the Sheriff's Office at the address noted.

You should come to court ready to explain your exemption. If you do not come to court and prove your exemption, you may lose some of your property.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELEGIBLE PERSONS AT A REDUCE FEE OR NO FEE.

**Lawyer Referral and Information Service
1101 Market Street, 11th Floor
Philadelphia, PA 19107-2911
(215) 238-6333**



PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA

34 South 11th Street, Philadelphia, PA. 19107

Marsha H. Neifield, President Judge Patricia R. McDermott, Deputy Court Administrator

SC-07-12-14-5464

Faye Riva Cohen, Esquire
 2047 Locust Street
 Philadelphia, PA 19103

Plaintiff(s)

Mary J. Scott
 1152 E. Phil Ellena Street
 Philadelphia, PA 19150

Defendant(s)

The PNC Financial Services Group, AKA/DBA: PNC Bank

Garnishee(s)

WRIT OF EXECUTION

(Money Judgment)

TO: THE SHERIFF OF PHILADELPHIA COUNTY:

To satisfy the judgment, interest and costs against the above-captioned defendant(s):

Mary J. Scott

1. You are directed to levy upon property of the defendant(s) and to sell defendant's (s') interest therein:

1152 E. Phil Ellena Street
 Philadelphia, PA 19150

2. You are also directed to attach the property of the defendant(s) not levied upon in the possession of The PNC Financial Services Group, (more)
 (Name of Garnishee)

All personal property contained therein

as garnishee, _____ and to notify the garnishee of the following:
 (specifically describe property)

(a) an attachment has been issued;

(b) except as provided in paragraph (c) the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant or otherwise disposing thereof;

(c) the attachment shall not include any funds in an account of the defendant with a bank or other financial institution

(i) in which funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law, or

(ii) that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by the executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa. C.S. § 8123.

3. If property of the defendant not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify such other person that he or she has been added as a garnishee and is enjoined as above stated.

REAL DEBT	\$ 7,629.20
CREDIT	\$ 0.00
INTEREST from 03/13/2008	\$ 1,917.87
COSTS PAID:	
Prothonotary	\$ 82.00
Sheriff	\$ _____

ATTEST

MAY 04 2012

NORA TAYLOR

Joseph Evers, Prothonotary

The Philadelphia Municipal Court

By: Nora Taylor Clerk

Date: 5/4/12



PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA

34 South 11th Street, Philadelphia, PA. 19107

Marsha H. Neifield, President Judge

Patricia R. McDermott, Deputy Court Administrator

SC-07-12-14-5464

Faye Riva Cohen, Esquire
2047 Locust Street
Philadelphia, PA 19103

Mary J. Scott
1152 E. Phil Ellena Street
Philadelphia, PA 19150

Plaintiff(s)

Defendant(s)

Overflow of Writ Garnishee Name List

AKA/DBA: PNC Bank

WRIT OF EXECUTION

THE PHILADELPHIA MUNICIPAL COURTCLAIM NO. SC-07-12-14-5464, 05/04/2012

Faye Riva Cohen, Esquire
2047 Locust Street
Philadelphia, PA 19103

Plaintiff(s)

Mary J. Scott
1152 E. Phil Ellena Street
Philadelphia, PA 19150

Defendant(s)

File No. _____

PHILADELPHIA SHERIFF'S OFFICE
2012 MAY 31 AM 9:17



PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
 34 South 11th Street, Philadelphia, PA. 19107

Louis J. Presenza, President Judge

Patricia R. McDermott, Deputy Court Administrator

STATEMENT OF CLAIM

Code: Other - (13)

SC-07-12-14-5464

Faye Riva Cohen, Esquire
 2047 Locust Street
 Philadelphia, PA 19103

Mary J. Scott
 1152 E. Phil Ellena Street
 Philadelphia, PA 19150

*Plaintiff**Defendant(s)*

Service Address (information) if other than above:

To the Defendant: Plaintiff is seeking a money judgment against the Defendant(s) based on the following claim:

TO THE DEFENDANT: The above named plaintiff asks judgment in this Court against you for \$10,000.00, the jurisdictional limit of this honorable Court, plus court costs upon the following claim: Mary J. Scott ("Defendant") retained Faye Riva Cohen, Esquire ("Plaintiff"), on June 17, 2002, to appeal salary adjustments that were an offset in a former workers' compensation claim in which Defendant had been represented by other counsel, as well as penalty provisions. (See Exhibit "1"). Plaintiff performed the necessary legal work for Defendant. Defendant made several payments, but still carried a substantial balance with Plaintiff. As of May 11, 2005, Defendant owed a balance of \$5,071.52. (See Exhibit "2"). Interest in the amount of \$4,761.02, calculated at 1.5% monthly (18% annually), accrued from December 15, 2003, and continues to accrue through the date of disposition of this matter. With compounded interest at 1.5% monthly (18% annually), accruing from December 15, 2003, plus attorney's fees and costs for collection at 35% of the balance due, in the amount of \$1,775.03, the total is \$12,496.74. Plaintiff respectfully requests that judgment be entered against Defendant and in favor of Plaintiff in the amount of Ten Thousand Dollars (\$10,000.00), the jurisdictional limit of this Court, plus court costs and fees.

Summons to the Defendant

You are hereby ordered to appear at a hearing
 scheduled as follows:

Citation al Demandado

Por la presenta, Usted esta dirijido a presentarse
 a la siguiente:

Philadelphia Municipal Court

4th Floor of 34 S. 11th Street, Phila. PA

Court Room

4D

at 09:15 AM on

February 19th, 2008

Amount Claimed

Principal	\$	5071.52
Interest	\$	4761.02
Attorney Fees	\$	1775.03
Other Fees	\$	0.00
Subtotal	\$	11607.57
Service	\$	27.00
State Fee	\$	10.00
Automation Fee	\$	5.00
Court Costs	\$	40.00
TOTAL CLAIMED	\$	11689.57

Date Filed: 12/14/2007

I, the undersigned, verify and depose that the facts set forth in this Complaint are true and correct and acknowledge that I am subject to the penalties of 18 P.S. 4904 relating to Unsworn Falsification Authorities.

FAYE R COHEN

2047 LOCUST ST
 PHILADELPHIA, PA 19103
 215-563-7776

Signature Plaintiff/Attorney
 Atty ID #: 018839

Address &
 Phone

NOTICE TO THE DEFENDANT, YOU HAVE BEEN
 SUED IN COURT. PLEASE SEE ATTACHED NOTICES.

AVISO AL DEMANDADO LE HAN DEMANDADO EN
 CORTE. VEA POR FAVOR LOS AVISOS ASOCIADOS.

If you wish to resolve this matter without appearing in court, please contact the attorney shown above immediately.

Law Office of Faye Riva Cohen2047 Locust Street
Philadelphia, PA 19103

Ph:(215) 563-7776

Fax:(215) 563-9996

Mary Scott

May 11, 2005

Attention:

File #: 1085.02-000

Inv #: Sample

RE: Duplicate file of Mary J. Scott

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Jun-17-02	Regular consultation	1.00	175.00	FRC
Jul-12-02	Conversation w/client re whistleblower (not workers' comp)	0.10	17.50	FRC
Jul-16-02	Voicemail and conversation w/client re issues (consultation)	0.40	70.00	FRC
Jul-18-02	Conversation w/Larry Brandenburg and Bob Miller (combination)	0.20	35.00	FRC
Jul-20-02	Review file/Pitt's file/conversation w/client and organize file partially federal	4.30	752.50	FRC
Jul-21-02	call from client and explain issues to her	1.00	175.00	FRC
Jul-22-02	call to Ludwig and Bellows	1.00	175.00	FRC
	calls to Snyder, Pitt, hearing office, fax from client	0.50	87.50	FRC
Jul-24-02	Call to Snyder and from client re 120 days to serve court (fed.)	0.20	35.00	FRC
Jul-25-02	Client issues re Bacote service	0.40	70.00	FRC
Jul-28-02	Conversation w/ Brandenburg re all state employees	0.40	70.00	FRC

Jul-31-02	Calls to Brandenburg/Miller/Office of General Counsel/client *	0.50	87.50	FRC
Aug-05-02	Hearing extension	0.30	52.50	FRC
Sep-22-02	Medical diagnosis center bill	0.10	17.50	FRC
Sep-27-02	Client's record of her two compensation issues workloads	0.10	17.50	FRC
Oct-05-02	Listen to voicemails, speak w/client	0.50	87.50	FRC
Oct-13-02	Pitt issue *	0.30	52.50	FRC
Oct-14-02	Service issues re summons (fed.) *	0.30	52.50	FRC
Oct-15-02	conference w/FRC re assignment	0.10	6.00	JWC
	Review of file	0.50	30.00	JWC
	research workers' comp penalty provisions	0.50	30.00	JWC
Oct-17-02	service of summons issues (fed.) *	0.10	17.50	FRC
Oct-18-02	listen to client call on voicemail	0.20	35.00	FRC
Nov-05-02	conference w FRC re assignment	0.10	6.00	JWC
Nov-06-02	Meeting with client	0.60	105.00	FRC
Nov-07-02	Jenkins law library - pick up latest workers' comp law and rules	0.50	87.50	FRC
Nov-09-02	Review rules faxed from Harrisburg	0.50	87.50	FRC
Nov-11-02	Review workers comp updates from Jenkins	1.50	262.50	FRC
Nov-13-02	Conversation w/Snyder and investigator Karen Porter (EEOC) *	0.50	87.50	FRC
Nov-17-02	Call from client re fraud issues, EEOC *	0.10	17.50	FRC
Nov-19-02	Letter to all persons client asked FRC to write to	2.10	367.50	FRC

May 11, 2005

Nov-21-02	Call from client	0.50	87.50	FRC
	conference w/FRC re assignment	0.10	6.00	JWC
	Research possible claims under penalty petition	0.40	0.00	JWC
Nov-26-02	conference w/FRC re memo	0.10	6.00	JWC
	review materials	0.40	24.00	JWC
	Draft memo	0.70	42.00	JWC
Nov-27-02	Letter from Snyder, called client ✱	0.40	70.00	FRC
Dec-02-02	Prepare for hearing workers comp	2.30	402.50	FRC
	Attend hearing	1.80	315.00	FRC
Dec-03-02	Research PA code	0.20	12.00	JWC
Dec-06-02	Review Snyder's letter to client ✱	0.10	17.50	FRC
Dec-11-02	Motion to dismiss issues (fed.) ✱	0.20	35.00	FRC
	conference w/FRC re assignment	0.10	6.00	JWC
Dec-13-02	Call from client/Unger (fed.) ✱	0.10	17.50	FRC
Dec-15-02	Issues regarding service (fed.) ✱	0.30	52.50	FRC
Dec-16-02	Client/Unger/Clerk & Bowman ✱	0.20	35.00	FRC
	Call from Unger (fed.) ✱	0.30	52.50	FRC
Dec-31-02	Review file	1.00	60.00	JWC
	Conference w/FRC by phone	0.10	6.00	JWC
Jan-07-03	conference w/FRC re next motion	0.10	6.00	JWC
	Conference w/FRC; research	0.30	18.00	JWC

Jan-11-03	Start workers comp brief - review research ✕	3.50	612.50	FRC
Jan-13-03	research WC issues	0.30	24.00	ASB
	review brief	0.30	18.00	JWC
	Write brief; edit/revise brief; confer w/FRC; phone calls, review exhibits	6.40	384.00	JWC
Jan-15-03	Met w/client, discussed exhibits, review draft brief, Pomerantz discussion	3.50	612.50	FRC
	Conference w/FRC re assignment; proofread brief; edit brief; conference re further research and revision; research penalties	2.50	150.00	JWC
Jan-16-03	Research differences: §991 vs. §996 of 77 PS	0.40	24.00	JWC
	Research §996 "unreasonable" claims cases	2.00	120.00	JWC
	Draft memo re: unreasonable claims	0.80	48.00	JWC
Jan-17-03	Finalize brief, insert research, <u>exhibits</u> , copies, mail ✕	8.00	1,400.00	FRC
Jan-27-03	Research workers comp issues	0.10	8.00	ASB
Feb-19-03	Review fax	0.20	12.00	JWC
Aug-05-03	took call re hearing dates	0.10	6.00	JWC
Aug-08-03	read decision	0.30	60.00	FRC
Aug-25-03	review letter from Labor Dept.	0.30	18.00	JWC
Aug-26-03	Research PA WC section 998;conference w/FRC re appeals and fees; research WC appeals process; call Commonwealth Court; memo re procedures; call from Commonwealth Court; call to Commonwealth Court again; call from Commonwealth Court; review fax	3.10	186.00	JWC
Aug-27-03	conference w/JWC re appeal procedure	0.20	40.00	FRC
	Drafted letter to MS re options	0.40	24.00	JWC

Aug-28-03	review appeal procedure	0.20	40.00	FRC
Aug-29-03	Review opinion for fee agreement insight; contact WC board office; conference w/FRC re call; call WC clerk's office; call back from WC clerk's office	0.90	54.00	JWC
Sep-17-03	call from client	0.10	20.00	FRC
	Conference w/FRC re petition issue; research 77-996; research cases under 996; research find in favor issues re fees; research quantum meruit claims; call WC office in Harrisburg; conference w/FRC re issues to deal with; find file in basement; call WC office in Harrisburg; conference w/FRC re: call; review fax; draft letter to Donna McQuiggan; Susan Snyder	3.60	216.00	JWC
Sep-18-03	Revise letter to Snyder; review brief for info for letter; fix computer glitch; conference w/FRC re letter; finish letter to McQ; finish letter to Snyder; prepare enclosures to Snyder	3.40	204.00	JWC
Sep-22-03	Review letter from McQuiggan; take call from commissioner	0.30	18.00	JWC
Oct-20-03	review file for phone number; call WC appeal board; conference w/FRC; draft fax to Bob Giles	0.80	48.00	JWC
Oct-27-03	Conferences w/FRC; revise fax; call WC	1.30	78.00	JWC
Dec-01-03	Conference w/FRC to follow up	0.10	6.00	JWC
Dec-15-03	Review file for latest communication; call Bob Giles; call Judy Goodling; call from Judy Goodling; draft fax to JG (letter of 10/28)	0.80	48.00	JWC
Aug-29-04	FRC: Issue re attorney's fee, billing	0.40	80.00	FRC
	Totals	72.90	\$8,999.50	

DISBURSEMENTS

Jan-17-03	45 pages x 7; 1020 page record	333.75
	315 page brief	78.75
Jan-27-03	Costs - copies, long distance calls/faxes, travel, parking	172.25

May 11, 2005

Aug-25-03	25 copies; 2 long distance calls	8.25
Oct-20-03	Costs	3.00
Dec-15-03	Facsimile expense; long distance to Spector	1.00
	Long distance; 2x Bob Giles; Julie Gooding	2.00
	Totals	<hr/> \$599.00
	Total Fee & Disbursements	<hr/>
	Retainers Applied	\$9,598.50
		4,526.98
	Balance Now Due	<hr/>
		\$5,071.52

PAYMENT DETAILS

Jan-17-02	Retainer	3,500.00
Oct-14-02	Fees for services rendered	26.98
Mar-03-03	Fees for services rendered	200.00
Apr-01-03	Fees for services rendered	200.00
May-01-03	Fees for services rendered	200.00
Jun-01-03	Fees for services rendered	200.00
Jun-30-03	Fees for services rendered	200.00
	Total Payments	<hr/>
		\$4,526.98

FAYE RIVA COHEN, ESQUIRE, ATTORNEY AT LAW
1427 SPRUCE STREET, PHILADELPHIA, PA 19102
(215)735-3373/FAX (215)735-2723

(Page 1 of 2)(employment, labor, discrimination, civil rights, private disability)

I/We, *Mary J. Scott*, having disability issues and/or worker's compensation issues surrounding or concerning my former or current employment, unemployment compensation, representation by my/our labor union, matters concerning my/our collective bargaining agreement, discrimination, and/or violation(s) of my/our civil rights, hereby retain Faye Riva Cohen, Esquire, as my/our attorney(s) in this matter to represent me/us in this matter, and to process, negotiate, arbitrate and/or litigate any action relating to this representation.

In consideration of Attorney Cohen's agreement to represent me/us in connection with all rights, actions and claims which I/we now have or which may arise in the future as a result of the above, I/we hereby agree:

1. To supply promptly, truthfully and completely all information, dates and material or documents requested by Attorney Cohen, as she determines are necessary or useful for the furtherance of these claims;

2. (a) To pay all costs and expenses incidental to the performance of legal services at all stages of representation. The terms "costs" and "expenses" shall include reproduction and/or copying costs which will be billed at \$.25 a page; \$.25 a page for each page of each document sent or received via telefax; filing fees; court costs; toll and long-distance telephone charges; postage charges; messenger fees, whether delivered by internal method or through hiring external services; transportation charges; record duplication fees; expert witness fees; subpoena fees; fees for obtaining medical records and/or business records, and all other disbursements necessary to the proper performance of legal services as are determined necessary by Attorney Cohen. I understand that all of the above-mentioned types of costs may not be incurred in my case.

(b) The terms "costs" and "expenses" shall also include research charges or fees incurred by the use of manual research methods or computerized research services, as well as charges for the services of law clerks, attorneys, legal assistants or paralegals which Attorney Cohen, at her discretion, decides to hire and/or contract with, for the purpose of helping her in the performance of services necessary to my representation, including, but not limited to, conducting research and preparing motions and pleadings. I hereby grant my permission for the afore-mentioned individuals to work on my case, and I agree that Attorney Cohen may bill for their services as a cost or expense, at rates between \$50 and \$85 an hour, depending on the type of services rendered.

(c) If Attorney Cohen decides to advance all or some costs and expenses at her discretion, as they are incurred, I agree to reimburse her as soon as I can, and if said costs are not reimbursed at the time I receive funds recovered by way of settlement or verdict from any pending litigation, said costs may be added to my attorney's share of said settlement or verdict upon receipt of funds.

3. (a) I/we agree to pay Attorney Cohen on an hourly rate basis for the year 2002 in the amount of \$175.00 an hour, plus costs and expenses. Services to be rendered past the year 2002 will be contracted for at the hourly rate established by Attorney Cohen for successive years. I/we have agreed to pay Attorney Cohen for 20 hours of services or \$3500. All amounts paid are non-refundable, but any unused amount may be applied toward other services as required. Attorney Cohen does not guarantee that the retainer will be sufficient to cover all of the legal services necessary in my/our matter. Attorney Cohen will consult with me/us when said retainer is used, and/or will send a bill, and no further services will be rendered once the retainer is used unless they are paid for in advance. *A \$25 L.R.'s fee for a 1/2 hour consultation was also paid as retainer. This case is separate from representation in a federal lawsuit.*

(b) It is further understood that the counsel fee payable as provided in this paragraph does not include services in any appeal after trial; and if an appeal should be brought or defended, the charge for such appeal shall be such as is mutually agreed upon between me/us and my/us and my/our attorney(s).

(c) I/we understand that Attorney Cohen's office may not in the normal course of business send statements of time and costs spent to date on my/our matter. Said statements will be issued when the retainer is used, prior to a new retainer being requested, and when this type of statement is requested by me/us.

(Page 2 of 2)

(d) I/we agree not to settle and/or adjust the above claim or any proceeding based thereon without first consulting my/our attorney(s) and obtaining their written consent.

(e) I/we agree to fully cooperate with my/our said attorney(s) in the prosecution of the claim that comprises the subject matter of the Agreement. This includes, but is not limited to, making myself/ourselves available for legal proceedings, for consultations with my/our said attorney(s), and keeping my/our said attorney(s) informed as to my/our current mailing address and telephone number.

4. I/we further state that I/we are at least eighteen (18) years of age, that I/we have read and do understand this Agreement and that I/we intend to agree that it shall be fully binding upon me/us, my/our heirs, executors and assigns. I/we further understand that Attorney Cohen's office does not guarantee the success or results of their representation.

5. If, through death, injury, retirement or other reasons, Faye Riva Cohen, Esquire, can no longer represent me/us, Attorney Cohen or her Executors shall secure the services of a successor attorney.

6. I/we appoint Faye Riva Cohen, Esquire as my/our attorney(s) and give her/them a complete Power of Attorney in this matter including the authority to sign documents on my/our behalf and all other authority inherent to a Power of Attorney.

7. In the event that I/we decide to terminate our representation by Attorney Cohen, or she decides to terminate my/our representation, all fees and costs accrued and not paid shall be paid within thirty (30) days of said termination. In the alternative, if Attorney Cohen so agrees, my/our new attorney shall agree to protect Attorney Cohen's interest to the extent of fees and costs incurred. If more than one party signs this agreement it is understood that each party agrees to be responsible for the total bill.

8. Collection Procedures: In the event I do not pay Faye Riva Cohen, Esquire the amount she is owed out of funds which I have received through her efforts, of which she was to have received a percentage as noted above, then I agree to pay for all collection costs including reasonable attorney's fees and the costs of collection, including court costs and filing fees which her office incurs in collecting said sums from me. Unless limited by law, reasonable attorney's fees will be considered to be 35% of my/our outstanding balance.

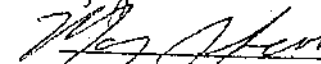
9. Interest: I agree that if I do not pay Faye Riva Cohen, Esquire the fee and costs due to her from any sums which I have received due to efforts on her behalf, then Attorney Cohen may charge me interest at the rate of 1.5% a month, compounded, not to exceed Eighteen (18%) a year, to begin thirty (30) days after the bill has been sent.

IN WITNESS THEREOF, the parties have hereunto set their hands and seals on this 17th day of June, 2002. I/we acknowledge that I/we have retained a copy of this Agreement and returned the original to Attorney Cohen.

FAYE RIVA COHEN, ESQUIRE

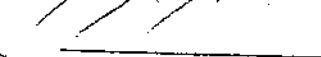
 (SEAL)

X CLIENT(S)

 (SEAL)

X Witness: Patricia Smoller

Dated: June 17, 2002

 (SEAL)

Mary Scott
1152 E. Philadelana St.
Philadelphia, PA 19150-2018

60 8111/2313

0283

Date 6/17/02

Pay to the
Order of

Tanya Kivori Cohen

\$ 3500

Thirty Five Hundred

Dollars

Security Features
Included Overleaf
on Back

PENNSYLVANIA STATE EMPLOYEES
CREDIT UNION
HARRISBURG, PA 17110-2990

01 5270

God lift up mine eyes unto the hills, from
whence cometh my help... Psalm 121

For

attorney fees.

Mary J. Scott

⑆231381116⑆0283⑆0459859716⑆⑆0000350000⑆

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8

EXHIBIT 1

United States District Court
Eastern District of Pennsylvania (Philadelphia)
CIVIL DOCKET FOR CASE #: 2:02-cv-03799-JED
Internal Use Only

SCOTT v. COMMONWEALTH OF PA, DPW

Assigned to: HONORABLE JAN E. DUBOIS

Referred to:

Demand: \$

Lead Docket: None

Related Cases: None

Case in other court: None

Cause: 42:1983 Civil Rights (Employment Discrimination)

Date Filed: 06/17/02

Jury Demand: None

Nature of Suit: 442 Civil Rights: Jobs

Jurisdiction: Federal Question

Plaintiff

MARY J. SCOTT

represented by **MARY J. SCOTT**
 1152 E. PHIL ELLEN STREET
 PHILADELPHIA, PA 19150
 PRO SE

V.

Defendant

COMMONWEALTH OF PA, DPW

represented by **SUE ANN UNGER**
 OFFICE OF ATTORNEY GENERAL
 21 S. 12TH ST., 3RD FL
 PHILADELPHIA, PA 19107-3603
 215-560-2127
 Fax : 215-560-1031
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED

Filing Date	#	Docket Text
-------------	---	-------------

(24)

JD

CASE MANAGEMENT TRACK DESIGNATION FORM

MARY J. SCOTT

CIVIL ACTION

COMMONWEALTH OF
PA - DEPARTMENT OF
PUBLIC WELFARE

NO. 02-3799

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a.) Habeas Corpus - Cases brought under 28 U.S.C. §2241 through §2255. ()
- (b.) Social Security - Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c.) Arbitration - Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d.) Asbestos - Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e.) Special Management - Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management case.) ()
- (f.) Standard Management - Cases that do not fall into any one of the other tracks. (X)

6/15/02
Date

JUN 17 2002

MARY J. SCOTT
Print Name of Pro Se Plaintiff

Mary J. Scott
Signature of Pro Se Plaintiff

Address of Plaintiff: 1152 S. PHILADELPHIA ST
 Address of Defendant: 1400 SPRING GARDEN ROOM 202C
 Place of Accident, Incident, or Transaction: 1400 SPRING GARDEN RM 202C

(Use Reverse Side For Additional Space)

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☐

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

- 1.) Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
 Yes ☐ No ☐
- 2.) Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
 Yes ☐ No ☐
- 3.) Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
 Yes ☐ No ☐

CIVIL: (Place ✓ in ONE CATEGORY ONLY)

A. Federal Question Cases

- 1.) ☐ Indemnity Contract, Marine Contract, and all Other Contracts
- 2.) ☐ FELA
- 3.) ☐ Jones Act-Personal Injury
- 4.) ☐ Antitrust
- 5.) ☐ Patent
- 6.) ☒ Labor-Management Relations
- 7.) ☒ Civil Rights
- 8.) ☐ Habeas Corpus
- 9.) ☐ Securities Act(s) Cases
- 10.) ☐ Social Security Review Cases
- 11.) ☐ All other Federal Question Cases (Please specify)

B. Diversity Jurisdiction Cases:

- 1.) ☒ Insurance Contract and Other Contracts
- 2.) ☐ Airplane Personal Injury
- 3.) ☐ Assault, Defamation
- 4.) ☐ Marine Personal Injury
- 5.) ☐ Motor Vehicle Personal Injury
- 6.) ☐ Other Personal Injury (Please specify)
- 7.) ☐ Products Liability
- 8.) ☐ Products Liability - Asbestos
- 9.) ☐ All other Diversity Cases (Please specify)

ARBITRATION CERTIFICATION

(Check appropriate category)

I, _____, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs.
- ☐ Relief other than monetary damages is sought.

Date 6/15/12

[Signature]
 Print Name of Pro Se Plaintiff

JUN 17 2002

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

Date _____

Signature of Pro Se Plaintiff _____



DEPARTMENT OF
LABOR & INDUSTRY
COMMONWEALTH OF PENNSYLVANIA

WORKERS' COMPENSATION APPEAL BOARD
CAPITOL ASSOCIATES BUILDING
901 N. 7TH STREET, 3RD FLOOR SOUTH
HARRISBURG, PA 17102-1412

717-783-7838

www.dli.state.pa.us

November 21, 2002

Faye Riva Cohen, Esquire
2047 Locust Street
Philadelphia, PA 19103

RE: Mary Scott v. Philadelphia Public Assistance Office
A02-1519

Dear Ms. Cohen:

I am in receipt of your fax dated November 19, 2002, regarding the above captioned.

The Workers' Compensation Appeal Board's scope of review is limited to a determination of whether there was an error of law or abuse of discretion committed by the Judge and whether the Judge's findings of fact are based upon substantial evidence. Since we are not the fact finders and are precluded from taking additional evidence; we do not issue subpoenas.

Your request to file claimant's brief 30 days after the December 3rd hearing is granted. A briefing schedule for defense counsel will be established at the time of oral argument.

I trust this information is helpful. If I can be of further assistance, please contact me.

Sincerely,

Donna D. McQuiggan
Administrative Officer

Cc: Jeffrey Snyder, Esquire

(15)



2047 Locust Street • Philadelphia, Pennsylvania 19103
Phone (215) 563-7776 • Fax (215) 563-9996
E-Mail fayercohen@aol.com

January 17, 2003

COPY

Acting Secretary
Workers' Compensation Appeal Board
Department of Labor and Industry
Capital Associates Building
901 N. 7th Street, 3rd Floor South
Harrisburg, PA 17102-1412

Re: *Mary Scott v. Commonwealth of PA/Public Welfare*
S. S. No.: ~~16-11-1111~~
Claim No. ~~16-11-1111~~
Date of Injury: 07/01/99
Case No.: A02-1519

Dear Acting Secretary:

Enclosed please find an original and five (5) copies of Claimant's Brief in Opposition to Judge's Decision. Kindly file the original of record and return the extra copy to me, time-stamped, in the enclosed self-addressed stamped envelope. In my discussion with a representative of your office recently, she advised that the date of postmark is sufficient to comply with the extension.

Thank you.

Very truly yours,

The Law Firm of Faye Riva Cohen


FAYE RIVA COHEN

FRC:pat
Enclosures
cc: Jeffrey D. Snyder, Esquire (w/encl.)

THE LAW FIRM DAVID OH, P.C.

DAVID H. OH*
TRISTRAM HEINZ*
BRIAN F. HUMBLE*
ELLEN M. FOLEY McCANN*
EMMA L. OH*
CATHLEEN A. SABATINO*
JEFFREY D. SNYDER**
CLIFFORD K. WEBER*

OF COUNSEL
ALBERT LAUFER**
JENNIE M. SHI**

THE NORTH AMERICAN BUILDING
AVENUE OF THE ARTS
121 S. BROAD STREET, 14TH FLOOR
PHILADELPHIA, PA 19107
OFFICE (215) 732-3244 • FAX (215) 732-2779
EMAIL: DAVIDOH@FAST.NET
WEB PAGE: WWW.LAWDRAGON.COM

SOUTH JERSEY OFFICE:
220 N. CENTRE STREET
MERCHANTVILLE, NJ 08109
(856) 665-2401

REPLY TO:
PHILADELPHIA OFFICE

* admitted to the bar of NJ
* admitted to the bar of NY
* admitted to the bar of PA
* admitted to the bar of MA
* admitted to the bar of DC
* registered to practice before
US Patent and Trademark Office

January 21, 2003 *

Acting Secretary
Workers' Compensation Appeal Board
Department of Labor and Industry
Capitol Associates Building
901 N. 7th St., 3rd Floor South
Harrisburg, PA 17102-1412

Re: Mary Scott v. Commonwealth of PA/Public Welfare
S. S. No: ~~185-10-1538~~
Claim No: ~~024-100-100003~~
Date of Injury: 07/01/99
Our File No: 9912001
Case No: A02-1519

Dear Acting Secretary:

I represent the defendant/appellee in the captioned matter.

I am in receipt of a copy of a brief filed on behalf of the claimant. That brief contains numerous exhibits that are abhors the record. My recollection is that the claimant's attorney was told at oral argument that no additional evidence would be accepted by the Board. In any event, I ask that the exhibits appended to the claimant's brief be stricken.

In addition, in reviewing the brief submitted on behalf of the claimant, the first full sentence on page 10 of that brief seems to indicate that the claimant's attorney has been paid some type of retainer and perhaps additional attorney fees as well. As the Board is aware, all legal fees charged to a claimant must be approved in advance. (Sections 442 and 501 of the Act) We respectfully defer to the Board's judgment regarding the nature and extent of any appropriate investigation relative to this issue.

Thank you.

Very truly yours,

The Law Firm David Oh, P.C.

Jeffrey D. Snyder

JDS/js

21

EXHIBIT 2



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ATTORNEY GENERAL

MIKE FISHER
ATTORNEY GENERAL

February 26, 2003

21 S. 12th Street, 3rd Floor
Philadelphia, PA 19107-3603
Telephone: (215) 560-2127
Fax: (215) 560-1031
E-Mail: sunger@attorneygeneral.gov

The Honorable Jan E. DuBois
United States District Court
12613 United States Courthouse
601 Market Street
Philadelphia, PA 19106-1766

Re: *Scott V. Commonwealth of Pennsylvania, et al.*
Civil Action No. 02-3799

Dear Judge Dubois:

Pursuant to the direction of this Court during the telephone conference of February 20, 2003, I have facilitated service in the above matter by obtaining leave to sign a waiver of service of summons form for Defendant Pennsylvania Department of Public Welfare. I have sent the signed waiver to the Clerk of Court.

Respectfully,

A handwritten signature in dark ink, appearing to read "Sue Ann Unger".

Sue Ann Unger
Senior Deputy Attorney General

SAU:bjtk
Enclosure
cc: Mary Scott

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARY J. SCOTT

Plaintiff,

v.

COMMONWEALTH OF PA. DPW.

Defendant.

CIVIL ACTION

NO. 02-3799

FILED
JUL 23 2003
ENTERED
JUL 24 2003
CLERK OF COURT

ORDER

AND NOW, this 23rd day of July, 2003, upon consideration of a Formal Request for Discovery submitted to the Court by plaintiff, Mary J. Scott, appearing *pro se*,¹ and the Response to Plaintiff's Formal Request Regarding Discovery submitted by defendant, IT IS ORDERED that the Formal Request for Discovery submitted to the Court by plaintiff, Mary J. Scott, appearing *pro se*, is DENIED on the present state of the record. The denial of the request is WITHOUT PREJUDICE to the right of the said *pro se* plaintiff to renew the request, if appropriate, at a later stage in the proceeding.

BY THE COURT:


JAN E. DUBOIS, J.

¹A copy of *pro se* plaintiff's Formal Request for Discovery contained in a letter dated July 19, 2003, shall be docketed.

FILED
AUG 06 2003

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARY J. SCOTT

Plaintiff,

vs.

COMMONWEALTH OF PENNSYLVANIA :
DEPARTMENT OF PUBLIC WELFARE :
Defendant. :

CIVIL ACTION

NO. 02-3799

ENTERED

AUG 06 2003

CLERK OF COURT

ORDER

AND NOW, this 4th day of August, 2003, defendant having filed a Motion to Dismiss Plaintiff's Complaint (Document No. 5, filed December 10, 2002), and plaintiff having submitted three documents which purportedly respond to the Motion to Dismiss, only one of which, a document with attachments dated February 5, 2003, has been docketed, **IT IS ORDERED** that the Clerk of Court shall docket the following documents submitted by *pro se* plaintiff:

1. Document dated July 24, 2003, with attachments which begins with the statement "I am requesting that the Commonwealth of PA. DPW Motion to Dismiss is denied, as a result of my original Complaint was never investigated by the Attorney General Dept. Which allowed the Commonwealth DPW, to continue with there fraudulents and wilful actions;" and,
2. Document entitled "Response to Defendant Motion to Dismiss Dated 12/10/02," received August 4, 2003, with attachments.

BY THE COURT:


JAN E. DUBOIS, J.

**UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT**

NO. 03-3971

Mary J. Scott

v.

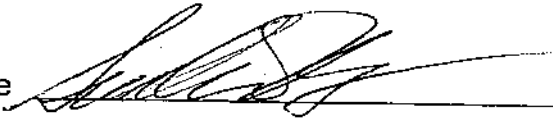
Commonwealth of Pennsylvania, DPW

The Clerk will enter my appearance as Counsel of Record for Commonwealth of Pennsylvania,
Department of Public Welfare

(Please list names of all parties represented)

who IN THIS COURT is	<input type="checkbox"/> Petitioner(s)	Respondent(s)	<input type="checkbox"/>
	<input type="checkbox"/> Appellant(s)	Appellee(s)	<input checked="" type="checkbox"/>
	<input type="checkbox"/> Intervenor(s)	Amicus Curiae	<input type="checkbox"/>

Signature



(Type or Print) Name Sue Ann Unger, Senior Deputy Attorney General

Mr. Ms. (Mrs.) Miss

Firm Office of Attorney General

Address 21 S. 12th Street, 3rd Floor

City & State Philadelphia, PA 19107-3603

Phone (215) 560-2127

Fax (215) 560-1031

E-Mail Address sunger@attorneygeneral.gov

**ONLY COUNSEL OF RECORD SHALL ENTER AN APPEARANCE.
THAT ATTORNEY WILL BE THE ONLY ONE NOTIFIED OF THE
COURT'S ACTION IN THIS CASE. OTHER ATTORNEYS WHO
DESIRE NOTIFICATION SHOULD MAKE APPROPRIATE
ARRANGEMENTS WITH COUNSEL OF RECORD.**

**ONLY ATTORNEYS WHO ARE MEMBERS OF THE BAR
OF THE COURT OF APPEALS FOR THE THIRD CIRCUIT OR WHO
HAVE SUBMITTED A PROPERLY COMPLETED APPLICATION FOR
ADMISSION TO THIS COURT'S BAR MAY FILE AN APPEARANCE
FORM. (BAR ADMISSION IS WAIVED FOR FEDERAL ATTORNEYS.)**

IT IS IMPORTANT THAT ALL REQUESTED INFORMATION BE PROVIDED.

W A I V E R

Supreme Court of the United States

No. 04-5908

Mary J. Scott

v.

Pennsylvania Department of Public

(Petitioner)

Welfare
(Respondent)

I DO NOT INTEND TO FILE A RESPONSE to the petition for a writ of certiorari unless one is requested by the Court.

Please check the following boxes:

☐ Please enter my appearance as Counsel of Record for all respondents.

☒ There are multiple respondents, and I do not represent all respondents. Please enter my appearance as Counsel of Record for the following respondents(s):

Commonwealth of Pennsylvania, Department of Public Welfare

I certify that I am a member of the Bar of the Supreme Court of the United States (Please explain name change since bar admission):

Signature: Howard G. Hopkirk

Date: August 27, 2004

(Type or print) Name Howard G. Hopkirk, Deputy Attorney General

☒ Mr.

☐ Ms.

☐ Mrs.

☐ Miss

Firm Office of Attorney General

Address 15th Floor, Strawberry Square

City & State Harrisburg, PA

Zip 17120

Phone (717) 783-1478

SEND A COPY OF THIS FORM TO PETITIONER'S COUNSEL OR TO PETITIONER IF PRO SE. PLEASE INDICATE BELOW THE NAME(S) OF THE RECIPIENT(S) OF A COPY OF THIS FORM. NO ADDITIONAL CERTIFICATE OF SERVICE IS REQUIRED.

Mary J. Scott
1152 E. Phil Elena Street
Philadelphia, PA 19150-3119

Obtain status of case on the docket. By phone at 202-479-3034 or via the internet at <http://www.supremecourtus.gov>. Have the Supreme Court docket number available.

EXHIBIT 2

ACQUITTAL

BETWEEN

CONVICTED CASE OF 1971 INFLUENCE

1971

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return. Employees shall not earn annual, personal and sick leave while on parental leave without pay. Paid leave is not to be included when calculating the 6 month entitlement.

Section 8. Guidelines

Guidelines established by the Secretary of Administration regarding parental leave are published through the Directives Management System (Reference Management Directive 530.2). Guidelines regarding State-paid benefits while on parental leave are published through the Directives Management System (Reference Management Directive 530.4).

Section 9. It is understood by both parties that the provisions of this Article are consistent with the Family and Medical Leave Act of 1993, 29 USC Section 2601 et seq. and that leave granted in accordance with this Article shall be designated as leave under the provisions of the Act.

ARTICLE 19 WORK-RELATED INJURIES

Section 1. An employee who sustains a work-related injury, during the period of this Agreement, as the result of which the employee is disabled, if so determined by a decision issued under the operation of the Workers' Compensation Program, shall be entitled to use accumulated sick, annual, or personal leave or injury leave without pay. While using accumulated leave, the employee will be paid a supplement to workers' compensation of full pay reduced by an amount that yields a net pay, including workers' compensation and social security disability benefits, that is equal to the employee's net pay immediately prior to the injury. Net pay prior to injury is defined as gross base pay minus federal, state, and local withholding, unemployment compensation tax and social security and retirement contributions. One full day of accumulated leave (7.5 or 8 hours as appropriate) will be charged for each day the supplement is paid. Accumulated leave and injury leave without pay may be used for an aggregate of 12 months or for the duration of the disability, whichever

ARTICLE 49
TERM OF AGREEMENT

This Agreement shall be effective as of July 1, 1999 except where specifically provided that a particular provision will be effective on another date. This Agreement shall continue in full force and effect up to and including June 30, 2003. It shall automatically be renewed from year to year thereafter unless either party shall notify the other in writing by such time as would permit the parties to comply with the collective bargaining schedule established under the Public Employee Relations Act.

The parties hereto through their duly authorized officers or representatives and intending to be legally bound, hereby have hereunto set their hands and seals this 1st day of July, 1999.

COMMONWEALTH OF PENNSYLVANIA

[Signature]
Thomas G. Pryor
Secretary of Administration

[Signature]
Michael J. Higgins, Esq.
Commonwealth Chief Negotiator

[Signature]
Christopher Thomas H. McConnell
Superintendent of Higher Education

SEIU, LOCAL 668 - PSU

[Signature]
John Weiss
President
SEIU, Local 668-PSU

[Signature]
John Weiss
Secretary-Treasurer
SEIU, Local 668-PSU

COMMONWEALTH OF PENNSYLVANIA

[Signature]
Chris T. Bortolotto

[Signature]
Stephen G. Hunsberger

[Signature]
Dany Hunsberger

[Signature]
Paul A. Allen

[Signature]
R. P. G. De

[Signature]
Chris Shygo

[Signature]
John Weiss

[Signature]
John Weiss

[Signature]
John Weiss

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John Weiss

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SEIU, LOCAL 668 - PSU

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John Weiss

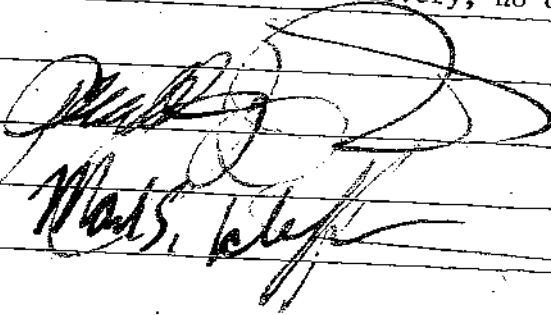
CONTINGENT FEE AGREEMENT

~~X~~ December 30, 2002 ~~X~~
DATE

I (We) hereby constitute and appoint Gerald J. Pomerantz & Mark S. Scheffer
as my (our) attorney to prosecute a claim for class action, denial of
due process against responsible parties. The
claimant is Mary J. Scott, and the cause
of action arose on ongoing violation.

I (We) hereby agree that the compensation of my (our) attorney for
services shall be determined as follows:

Such fee as the court determines appropriate for lead plaintiff in any class action
that may be ripe. No fee in the event of no recovery; no costs to be assessed
against plaintiff.


Mark S. Scheffer

I (We) was (were) recommended to my (our) attorney by:
Ellen Walton

I (We) hereby acknowledge receipt of a duplicate copy of this
Contingent Fee Agreement.

Mary J. Scott
NAME

NAME

ADDRESS

ADDRESS

Law Offices

Pomerantz, Scheffer & Associates ⊕

7TH FLOOR, STEPHEN GIRARD BUILDING
21 SOUTH 12TH STREET
PHILADELPHIA, PA 19107-3603
TELEPHONE (215) 569-8866
FAX (215) 568-6511

GERALD JAY POMERANTZ
MARK S. SCHEFFER
MICHAEL W. JONES
STEVEN J. SCHATZ*

* ALSO ADMITTED IN NEW JERSEY

OF COUNSEL: STUART A. RADICK*

* ADMITTED IN NEW JERSEY

MONTGOMERY COUNTY OFFICE

S.E. COR. SPRING & ELKINS AVENUES
ELKINS PARK, PA 19027

NORTHEAST OFFICE

6306 RISING SUN AVENUE
PHILADELPHIA, PA 19111

NEW JERSEY OFFICE

100 WHITE HORSE AVENUE
HAMILTON, NJ 08610
(609) 581-0014

⊕ - NOT A PARTNERSHIP

* May 20, 2003 *

Mary J. Scott
1152 E. Phil-Ellena Street
Philadelphia, PA 19150-3119

Re: Scott v. Commonwealth of Pennsylvania, DPW
Class Action for Benefits

Dear Ms. Scott:

In reviewing my files I realized that although we discussed on the telephone the fact that our office was not in a position to pursue your cause of action, I had not confirmed this in writing to you.

This letter will therefore confirm that we will not be filing suit or otherwise proceeding on your behalf in connection with the above-referenced matter.

Please feel free to call me if you have any questions.

Sincerely,


GERALD JAY POMERANTZ

GJP:net

August 12, 2003 ✕



Mary J. Scott,
Petitioner
v.
Workers' Compensation
Appeal Board (Philadelphia
County Assistance Office),
Respondent

Initiating Document: Petition for Review

Case Status: Active

August 11, 2003

Awaiting Original Record

Case Processing Status:

Journal Number:

Case Category: Administrative Agency

CaseType:

Workers' Compensation Appeal
Board

Consolidated Docket Nos.:

Related Docket Nos.:

COUNSEL INFORMATION

Petitioner Scott, Mary J.

Pro Se: ProSe

Appoint Counsel Status:

IFP Status:

Attorney: Scott, Mary J.

Bar No.:

Law Firm:

Address: 1152 East Philellena Street
Philadelphia, PA 19150-2018
Phone No.: (215)924-5204

Fax No.:

Receive Mail: Yes

Respondent Philadelphia County Assistance Office

Pro Se:

Appoint Counsel Status:

IFP Status:

Attorney: Snyder, Jeffrey David

Bar No.: 38405

Law Firm: Oh, David H., The Law Firm, P.C.

Address: David Oh Law Firm
121 S Broad St 14th Fl
Philadelphia, PA 19107
Phone No.: (215)732-3244

Fax No.:

Receive Mail: Yes